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PROPERTY TRANSACTION
ENVIRONMENTAL ASSESSMENT
OF
CHRYSLER LAND
12140 SLAUSON
SANTA FE SPRINGS, CALIFORNIA
CA037120
FOR
SANTA FE PACIFIC REALTY CORPORATION

JANUARY 11, 1989



McLaren Environmental Engineering

CHRYSLER LAND
12140 Slauson
Santa Fe Springs, CA

Site Description

Until March 1988, the vacant, 40-acre property located at 12140 Slauson in Santa Fe Springs was operated by Chrysler Corporation as the New Car Preparation Incorporated facility. The facility consists of 17 buildings, the majority of which are open sided, metal framed sheds, and open asphalt areas. The Chrysler site is bounded by light industry to the north and west, light industry and retail stores to the east, and a storm drain canal, railroad and auto facility to the south.

According to Chrysler employees, the site was vacant land until the early 1960's when General Motors began car preparation operations at the site as Dallas Smith Service Corporation. In 1967, Chrysler began using the facility for similar operations under the name of Automotive Precheck. In 1973, the name was changed to New Car Preparation System, Incorporated (Nu Car Prep). Car preparation operations formerly conducted at the site include body work, mechanical work, tune-up, front-end alignment, emissions control testing, painting, washing, detailing, and road performance tests.

Site Inspection

McLaren Engineering conducted a preliminary site walk on March 29, 1988 with representatives of Santa Fe Pacific Realty and Chrysler Corporation. A site inspection was then performed by McLaren Engineering on April 20, 1988. On both occasions, Mr. Jim Parker, operations manager for Chrysler Corporation, was available to answer questions and explain past practices at the facility. Figure 1 depicts the property layout and pertinent features discussed below.

According to Mr. Parker, Chrysler has removed all underground tanks and clarifiers known to exist on the property. These include three 10,000-gallon fuel tanks, six 3,000-gallon fuel tanks, and five 550-gallon waste tanks and clarifiers as shown on Figure 63. In addition, 14 hydraulic hoists, 8 service pits, and a carwash basement have been removed by Chrysler.

The majority of the buildings on the site were constructed in the 1960's and early 1970's. During this time period, buildings were frequently constructed with asbestos containing materials. Hanging light ballasts found in both enclosed and open sided buildings may contain Polychlorinated biphenals (PCB's).

The following paragraphs discuss the type of buildings located on-site, past activities, and chemical use, storage, and disposal practices associated with each building. Historical sewer and drainage system locations are complex and uncertain. Therefore, the plumbing for the sewer, waste treatment and discharge, and other operations are not discussed in detail. However, general information regarding these components will be discussed in the Agency Research section below.

Administration Building

The Administration Building located at the facility entrance (Figure 1) is a one-story structure consisting of offices, restrooms and lobby areas. No chemicals are used, stored, or disposed in this building. The age of the building indicates that the walls, insulation and ceiling tiles may contain asbestos.

East of the administration building is a transformer shed containing three dry electrical transformers which are in good condition. According to Mr. Parker, the transformers were identified as dry. Chrysler has never owned any 'wet' transformers which may contain PCB's. Southern California Edison Company (SCEC) has a 'wet' transformer near the main entrance. This transformer may contain PCB's.

Uniform and Maintenance Building

Adjacent to the transformer area is a metal-sided building used for uniform supply and "maintenance materials". No chemicals were stored in the building, but the structure itself is in poor condition. A gas island was formerly located just south of the Uniform and Maintenance Building. Two 3,000-gallon unleaded fuel tanks were removed from this location in March 1988, (Figure 1).

Chrysler Emissions Control Lab

At the eastern most portion of the property are the Hot-Start and Cold-Start Buildings known as the Chrysler Emissions Control Lab. As shown on Figure 1, two 3,000-gallon underground fuel tanks and a clarifier (3-stage) have been removed in the west portion of the Hot-Start building. This building is oriented in a north-south direction with only the center portion enclosed. The sections to the north and south consists of concrete pads with steel beams and metal roofing. This construction is typical of other buildings on-site.

Two walls of the Hot Start Building were partially demolished during removal of two service pits. Trash and debris were seen throughout the building. Open buckets and 55-gallon drums containing liquids which smell of hydrocarbons were seen both inside and outside the building. These containers have leaked onto the concrete. Other surface areas are also stained with oily/greasy liquids. The outline of various

plumbing components and what appears to be a sump associated with the Hot Start Building's operations were observed in the room adjacent to the service pit excavations. Minimal staining was seen around exposed piping in this area.

A hoist had been removed outside the northeast corner, as shown on Figure 1. The concrete adjacent to the hoist excavation also showed extensive oil staining and was cluttered with debris. Exposed insulation at the rear of the building appeared to be asbestos containing material. A surface drain and about five metal drain covers for sewer or water systems were noted in the covered area outside the southeast portion of the building. No staining was evident on or near these features.

The Cold-Start Building located in the southeast property corner was used for conducting cold engine emissions control tests. Two service pits, or dynanometers, and a clarifier (3-stage) were removed from the west side of the building as shown on Figure 1. The building is partially demolished in the excavated area and miscellaneous debris and trash was seen.

A concrete pad is located outside of the building to the north. Three hoists have been removed from the central enclosed building area. Three 10-inch diameter drains are located in the concrete floor south of the hoists. A drain cap was lifted and standing liquid was observed. A room in the southeast corner appears to have been used for chemical storage since barrel rim outlines were seen on the concrete. Small tools, pipes and debris are contained in the room. Debris and broken asphalt were seen outside the north and south walls and at the east end of the building where excavations occurred.

Front End Building

West of the Cold-Start Building is a Front End Building which consists of a small enclosure and metal roofed area for electricity and water controls. Two service pits have been removed from the open sided portion and a clarifier was removed north of the building (Figure 1). Two drains and the concrete outline of drainage piping were observed between the pit excavation areas.

All that remains of the Tune-Up Building located west of the front end building is the concrete pad. Four service pit excavations were observed in the concrete foundation. A fuel station was formerly located directly east of these pit excavations. A 10,000-gallon fuel tank has been removed and no other evidence of a station remains.

Mechanical Warranty/Parts Buildings

The Mechanical Warranty Building and the Warranty and Parts Building are located north of the Front End Building (Figure 1). The Mechanical Building is an open-sided, metal-roofed structure containing four hydraulic hoists and 13 hoist excavations. According to Mr. Parker the hoists were installed in 1984 and removed by Chrysler in March 1988. The remaining four hoists were installed around 1963.

Water and electrical piping, and hanging fluorescent lights extend the length of the ceiling, which is typical of all the buildings on-site. Oil-stained soils and broken piping were observed near several five-foot by seven-foot hoist excavations. The concrete at the base of the hoist control piping showed extensive staining. The concrete around two of the remaining hoists was also heavily stained. A surface drain and electrical power controls were seen near the center of the building where four 550-gallon waste tanks had been removed (Figure 1). This drain and the surrounding concrete were stained with what appeared to be oil.

The metal-sided Warranty and Parts Building is similar in structure to the adjacent building and includes an enclosed portion for an office and a parts supply room. Two remaining hoists and two hoist excavations are located in the building. The excavations were not compacted, but overpiled with loose soil and wood debris. Oil staining was evident at the base of the hoist controls. A 550-gallon waste oil tank has been removed east of this building (Figure 1).

As part of this assessment, four hoist excavations were sampled to determine if hydraulic oil had leaked to underlying soils.

Paint Building

In the early 1960's, the Paint Building located just west of the Warranty/Parts Building consisted of a carwash and paint spray booth. The carwash enclosure was later replaced with two larger paint spray booths, as shown on Figure 1. Only the concrete booth pads remain, all of which have drains for paint rinse washdown. The largest booth pad, 20 by 12-feet, is elevated about 2-inches and is presently covered with dried paint powder and residue. Soil samples were collected beneath this booth pad to determine if paint constituents such as metals or solvents are present in underlying soils.

The original paint spray booth area is bordered by a 3" high concrete berm. Piping was observed directly adjacent to this berm. According to Mr. Parker, acrylic and enamel paints were used in all booth areas. The outline of the filled carwash conveyor belt trench and associated plumbing was observed adjacent to this booth.

A fourth paint spray booth outside the south end of the building was recently constructed and has never been used. The elevated booth pad, is bordered by a concrete berm and includes an underground concrete basement. Besides powdered dried paint stains, trash, and structural debris, the concrete flooring was free of any liquid ponding or staining.

Body Works Building

The Body Works Building located west of the Paint Building is steel framed with a concrete floor and metal roof. Other than wood and metal debris, the building is empty. A clarifier has been removed just outside at the southeast portion of the building, as shown on Figure 1.

Car and Truck Auto Detail

Parallel to the Body Works Building is a structure comprised of a car and truck wash/air brush area and automobile detailing area, as depicted on Figure 1. Adjacent to the carwash portion of the building is an enclosure formerly used for flammable materials. It is presently empty. A three-stage clarifier was removed just east of this enclosure. A carwash basement which housed an electrical service panel and motor was removed from the southern end of the carwash. Two carwash conveyor belt trenches, approximately 10 to 12 inches deep, extend half the length of the partially enclosed building. Broken pipes and leaking and corroded control valves were seen within the trenches. The interior of the trenches is excessively stained and an oily sludge has accumulated and concentrated near the exposed piping. Broken concrete and metal debris were also observed in this area. The remaining half of the carwash consists of asphalt and two 10-12 inch floor drains.

The central portion of the building paralleling the carwash was initially used for detailing automobiles and in 1987 was modified to be a carwash. When carwash operations began, the adjacent truck and carwash facility was shut down. A concrete pad extending about 75-feet south of the Detail Building contains an elongated drain and a 10- to 15-foot conveyor belt trench. Another conveyor belt trench extends the length of the Detail Building. As was observed within the adjacent carwash, both trenches contain stained soils, piping, and debris. Floor drains are located at about 10-foot intervals, the length of the building and underground piping likely associated with the drains is outlined in the concrete surface. The lid of a sump was observed between the trench of the Detail Building and the elongated drain grid extending southward.

According to Mr. Parker, the sump was installed to pump drainage from the new car wash section to the height of the Detail Building's drainage system. The sump failed and its use was discontinued. A hose extension and pump were then implemented to achieve the same result.

Ponding of oily liquid and excessive staining was observed on the concrete at the south end of the Detail Building.

A third carwash was operated south of these buildings. Two 12-inch deep concrete trenches extend the length of the carwash foundation. Soil at the base of the trenches is moderately stained. Littered steel piping, wires and other metal debris were observed within and around the trenches. A steel partition separates the above ground hydraulic tank pump and the carwash interior. Excessive oil stains were seen on the concrete pad, at the base of the hydraulic system. A clarifier was removed from just outside the north end of the carwash enclosure.

Production Control/Port Operations Tower

The building has two stories and is constructed similar to the Administration Building. The bottom floor consists of an office, storage areas, and main lobby. No hazardous chemicals appeared to have been used or stored in this building.

Quality Control/Traffic Building

The Quality Control/Traffic Building located directly west of the Control Tower, consists of an office, lobby, restroom and electrical control storage room. A water heater, electric system controls, insulation materials, broken fluorescent lights with ballasts, trash, metal pipes, and other debris were scattered on the floor of the storage area. Prior to 1985, a fuel island and four 10,000-gallon underground fuel tanks were located just west of this building. According to Mr. Parker, the tanks were removed in 1985 and 1986.

Import Installation Facility

In 1983, the Import Installation Facility was constructed in the western portion of the property, as shown on Figure 1. The building is about 250-feet long and consists of a central metal enclosure, and two open-sided metal roofed sections that extend to the west and east. An uncovered concrete pad was observed to the north. The concrete pads have sloped bases and drainage outlets. No evidence of chemical usage or storage was observed in this area. Only wood pallets, broken and rusted overhead light components, and other debris were seen.

Agency Research and Site History

In addition to conducting agency research, information regarding removal of the service pits, carwash basement, hoists, and underground tanks was obtained directly from the contractors involved and Mr. Parker. The verbal information is summarized below and is followed by a discussion of agency research results.

A 1988 aerial photograph and various historical blueprints/plot plans dating back to 1963 were obtained from SFPR. These materials were reviewed for facility development patterns, building operations, and locations of underground tanks, pits, clarifiers, paint booths and other features associated with those operations. Particular attention was given to the consistency between information shown on the plans and that reported by Chrysler Corporation.

One drawing showed the facility buildings and the sewer and storm drain system alignment dated July 7, 1973. This particular drawing also indicated that a fuel island and storage shed were located about 50 feet and 20 feet, respectively, from the southern boundary, in the southwest corner of the property. This area was reinspected for any surficial evidence or fill pipe that would indicate a fuel island once existed at this location. Observations revealed a 22 foot by 28 foot delineated area of darker colored asphalt, approximately 25 feet from the southern fence. No fill pipe was found. The location of the darkened asphalt area corresponds more closely with the shed location, as depicted on the drawing.

Mr. Parker who had been with the company at this facility since 1976 was questioned about these findings. He recalls no fuel island ever having existing at the depicted location on the plan. However, he did recall that four to five years ago this approximate area was used to dump trash (i.e., rocks and debris) for the sweeper to collect. The area was asphalted six to eight months ago, which may explain the darker color.

As shown on Figure 1, and discussed above, two concrete service pits from the Front End Building and four service pits from the Tune-Up Building were removed in March, 1988. One Front End Building pit was previously used for undercoating cars and the second pit was used for an alignment machine. Reportedly, the four tune-up concrete pits arranged in tandem were used only six months. According to Colorado Pacific Constructors, Incorporated, (CPC) who were contracted by Chrysler Corporation, all pits were removed as a safety precaution and therefore the excavations were not tested for contamination. According to Mr. David Pond of CPC, the pits were washed out with water and the rinsewater was pumped into tanks for recycling. There is no record of the concrete disposal destination.

The carwash basement, (Figure 1), was removed along with the six service pits. Mr. Parker expressed concern that this basement had collected a large quantity of oil sludge over the years. CPC stated that based on visual inspection at the time of removal, contamination was determined to be of no concern. As with the pits, removal of the

basement was considered a precautionary measure and no sampling was performed. The basement was washed and pumped dry. The oily water was recycled, solvent rinse material was manifested to an appropriate disposal site, and the concrete was disposed of as non-hazardous solid material.

In March, 1988, 15 hydraulic hoists were removed by Pacific Lift and Hoist Company, who had installed the hoists in 1984. The owner, Mr. Larry Gagnon, was consulted regarding the removal procedures. Reportedly, no permits were obtained and no samples were taken in any of the hoist excavations. This type of hoist has an underground 32 gallon hydraulic oil tank attached to the hoist. Reportedly, upon removal none were observed to be leaking and all the hoists were eventually sold. Per Chrysler's instructions, the contractor did not remove the four western-type hoists, which were installed around 1963, because these were never installed or operated by Chrysler. Removal of these remaining hoists is currently being handled by SFPR. The regulatory agency requirements regarding hoist removal is discussed later in this section.

Mr. Parker recommended to Chrysler that the conveyor belt trenches associated with Nu Car Prep's three carwashes be removed because automobiles entering the carwash and detail buildings were observed to leak oil and grease. However, removal of the trenches and associated piping was not included in the contract with CPC.

As indicated on Figure 1, four 10,000-gallon and two 3,000-gallon underground fuel storage tanks had been removed in 1985 and 1986 by Moine Brothers, Incorporated. Subsequent removals of tanks, clarifiers, service pits, and a carwash basement were conducted by CPC in 1988.

Closure permits for all the tanks and clarifiers were on file with the Los Angeles County Engineers, as discussed later in this section. However, the agency did not require reports for 1985/1986 tank removals. In 1988, Chrysler contracted CPC to remove ten underground storage tanks and seven concrete clarifiers from 12 different locations at the Nu Car Prep site. CPC obtained the services of Petroleum Industry Consultants (PIC) to provide a geologist to monitor excavation and removal procedures as well as prepare a geologic report on the excavation and removal operations. At the time of this assessment, the 1988 closure report had not yet been submitted to the Los Angeles County Engineers and therefore, CPC was contacted for a copy of the report.

PIC's report, titled Tank Removal Geologic Report for Chrysler Motor Nu Car Prep Center, dated March 31, 1988, was reviewed by McLaren Engineering for completeness and appropriateness of field procedures and analyses.

Soil samples obtained from under the tanks and clarifiers after their removal were reported to contain total petroleum hydrocarbons (TPH) at levels between 490 and 25,000 parts per million (ppm) at five of the twelve sites. These sites consist of: two 3,000-gallon unleaded fuel tanks located southeast of the Administration Building; a 750-gallon clarifier adjacent to the hazardous materials storage area, a 500-gallon clarifier located east of the Mechanical Warranty Building, two 550-gallon waste oil tanks located west of the Mechanical Warranty Building, and the 500-gallon waste oil tank adjacent to the Parts Building. Soil samples at the remaining sites were reported to contain TPH levels between nondetected to 72 ppm, with a detection limit of 1 ppm.

Excavation of the contaminated soil at each of the five sites was implemented due to the elevated levels of TPH. PIC collected soil samples from the bottom of the excavation pits and from each of the pit walls. Excavation depths ranged from 10 to 25 feet below surface.

PIC reported that all of the samples from the five excavations contained TPH concentrations of 42 ppm or less with the exception of one sample which contained 110 ppm. McLaren Engineering's review of the analytical data sheets indicated that only two of the five sites excavated had soil samples with TPH levels less than 100 ppm. The remaining excavations, for the unleaded gas tank (east tank), 500-gallon clarifier, and waste oil Tanks 5 and 6, contained soil samples with TPH levels between 110 ppm to 7,400 ppm. The elevated TPH levels were primarily found in samples taken from the walls at the bottom of the excavations. Regulations of the Los Angeles County Department of Public Works require that TPH levels in soil samples from excavations be less than 100 ppm.

A groundwater contour map presented in the PIC report indicates groundwater beneath the Nu Car Prep site is approximately 45 feet below ground surface.

In addition, the closure report did not include soil logs which would provide information needed to estimate and evaluate the volume of contaminated soil present, the potential for TPH to reach groundwater at a depth of 45 feet, and the presence of a perched zone. Also, hazardous waste manifests were not included.

Review of SFPR files for the Nu Car Prep site revealed a letter concerning hazardous materials at the facility. The first letter, dated November 6, 1985, concerns Southern Pacific Industrial Development Company's (SPIDCo) inquiries about the owners of three underground fuel tanks. The three tanks are reported to never have been used by Nu Car Prep. SPIDCo contacted the City Fire Department in an effort to

identify the installer but was advised that they have no record of the tanks. SPIDCo concluded that the tanks may have been installed by Commercial Carriers, the land tenant prior to Nu Car Prep. Enclosed with the letter was a request to remove the three tanks. Information concerning the tank removal was not contained in SFPR files.

McLaren Engineering contacted the following agencies by telephone, letter, and/or in person for file information for the Nu Car Prep facility:

- . Los Angeles County Department of Health Services (DHS);
- . South Coast Air Quality Management District (SCAQMD);
- . Regional Water Quality Control Board (RWQCB); Los Angeles Region;
- . Los Angeles County Department of Public Works; and
- . City of Santa Fe Springs Fire Department.

Results of agency file review are summarized below for each agency.

County of Los Angeles Department of Health Services (DHS)

File information from the County of Los Angeles Department of Health Services (DHS) indicates that Chrysler Nu Car Prep had five 10,000-gallon underground gasoline tanks; two 3,000-gallon underground gasoline tanks; and five 550-gallon underground automatic transmission fluid and motor oil tanks. Eleven of the tanks were installed in the 1960's and the twelfth tank was installed in 1973.

On December 2, 1985, Nu Car Prep submitted a Hazardous Materials Underground Storage Permit for seven of the twelve underground tanks (two 3,000-gallon, one 10,000-gallon, and five 550-gallon). The letter attached to the application stated that the seven tanks were maintained and operated in a safe manner and that no unauthorized releases had occurred at the Nu Car Prep site during past operations. The letter also stated that none of the tanks had been precision tested, but that action to accomplish the testing task would be done within 90 days of December 2, 1985. The DHS files did not contain any information concerning subsequent tank testing results for the Nu Car Prep site.

On December 9, 1985, and February 20, 1986, Nu Car Prep submitted an Application For Closure - Hazardous Materials Underground Storage to DHS for the remaining five underground tanks (four 10,000-gallon tanks and one 550-gallon tank).

It is known by McLaren Engineering that the remaining seven tanks were removed in March, 1988; however, no permits or information concerning these tank removals were located in the DHS files.

The submittal of the tank removal permits and hazardous material storage permits by Nu Car Prep in 1985 and 1986 resulted from an inspection by DHS of the Nu Car Prep facility on July 12, 1985. In addition to permitting the underground storage tanks, Nu Car Prep was ordered to immediately discontinue the disposal of hazardous waste (paint residue) into a nearby storm drain. DHS files do not indicate what steps were implemented to discontinue the disposal of paint sludge into the storm drain.

Additional items of concern in the field notes compiled by DHS for the Nu Car Prep site are listed below:

- . Chlorinated hydrocarbons (trichloroethylene and perchloroethylene) are used at the site;
- . A 550-gallon waste oil sump was located at the site. Field notes indicate the sump's contents are disposed of by a registered disposal firm;
- . A three stage 750-gallon clarifier and an eight stage 1,250-gallon clarifier were located in the carwash on the site;
- . Three paint booths were located at the site; and
- . Numerous 55-gallon drums containing oils and solvents were located at the site.

Except for the waste oil sump's contents, the field notes do not indicate how the remaining hazardous materials were stored or disposed.

The DHS file also provided a record of Material Safety Data Sheets for detergents, degreasers, emulsifiers, hydrocarbons, and butyl alcohol which were used in Nu Car Prep operations.

South Coast Air Quality Management District (SCAQMD)

The SCAQMD file indicated that the Chrysler Nu Car Prep facility had two gasoline storage permits, one permit for the use of distillation - recoverable solvents, permits for four spray booths, two applications for spray paints, and one application for distillation solvents.

Regional Water Quality Control Board (RWQCB)

Review of the waste discharge permits and the list of leaking underground tanks provided by the RWQCB - Los Angeles Region indicated no records are associated with the Chrysler Nu Car Prep facility.

Los Angeles County Department of Public Works

The Los Angeles County Department of Public Works file contained closure permits from Nu Car Prep for the five underground fuel tanks previously discussed in the DHS agency review. It appears that soil samples were to be collected at a depth of four feet below the tanks and analyzed for total petroleum hydrocarbons. However, the agency's files did not contain any information concerning the results of the soil analyses.

Public Works records also contained permits for industrial wastewater discharge and notices of violation of NuCar Prep's industrial wastewater permit requirements. Violations of concern include discharging wastewater containing hexavalent chromium at 150 ppm to a storm drain and discharging carwash wastewater to the ground surface. Information on steps implemented to reduce hexavalent chromium levels to acceptable levels was not available in the agency's files. Nu Car Prep submitted a letter shortly after receiving the carwash wastewater violation stating the carwashing operation would be discontinued.

According to Carl Sjoberg of the Engineering Department, the agency does not currently regulate the removal of hydraulic hoists, which are considered to be pressure vessels, or concrete service pits/basements. However, sampling is recommended if soil contamination is evident upon removal of these structures.

City of Santa Fe Springs Fire Department

Review of the City of Santa Fe Springs Fire Department records indicated that a number of Industrial Waste Discharge Permits were issued to Chrysler Nu Car Prep System, Inc. between 1964 and 1983. These permits were issued with the contingency that all wastewater generated at the facility be pretreated by interceptors or clarifiers prior to discharge to the sanitary sewer. Eight interceptors ranging in size from 510-gallon to 1,250-gallon capacities were installed to provide pretreatment for floor wash-down water, carwash discharge water, and cooling water from two dynamometers.

Violations of the industrial waste discharge permit were recorded in 1966, 1970, and 1976. The inspector's report for the 1966 violation describes the presence of a "heavy layer of hydrocarbons" in the pretreatment system outlet chamber. In 1970, a violation was recorded when a sample of discharge water from the car wash storm drain was found to contain 150 ppm chromium. In response to this violation, the tenant diverted the wastewater to a pretreatment interceptor to reduce the chromium level in the discharge. A third violation was issued in 1976 which caused Chrysler Nu Car Prep to discontinue the car washing operation at the site.

A reference made by the County of Los Angeles Engineering Department to an NPDES (National Pollution Discharge Elimination System) permit was noted in the fire department file. The permit outlines the discharge requirements for cooling water from the two dynamometers located at the facility.

Conclusions

Observations and conclusions regarding the Chrysler Land include:

- 1) The buildings were constructed in the early 1960's and early 1970's and therefore, may contain asbestos-bearing materials. SFPR is conducting a separate asbestos survey and sampling program.
- 2) Fluorescent light ballasts located in buildings throughout the facility may contain PCB's. However, light ballasts contain relatively small amounts of PCB's, and the State does not have an active policy regarding light ballast removal.
- 3) Based on review of PIC's tank closure report, there is a potential for soil contamination in backfilled excavations of the (east) 3,000-gallon unleaded fuel tank, the 500-gallon clarifier, and waste oil Tanks 5 and 6.
- 4) The integrity of plumbing and associated drainage systems for the Chrysler Emissions Control Lab is uncertain.
- 5) Field observations upon collecting soil samples at the base of four hoist excavations indicated the presence of total petroleum hydrocarbons (TPH), beginning at a depth of about 5 feet. However, TPH was not detected by laboratory analyses. The potential for soil contamination beneath the 11 remaining hoist excavations, the 6 remaining hoists, and the hoist controls is uncertain. Due to the age of the six remaining hoists, it is likely that the tanks associated with these hoists have leaked to soils.
- 6) Analytical results for samples collected from beneath one concrete spray booth pad indicate that heavy metals were not detected in underlying soils. Solvents were not detected with the exception of trichloroethylene (TCE), detected at 0.03 ppm, which is a relatively low concentration.
- 7) There is a potential for soil contamination in service pit and carwash basement excavations.
- 8) Soils beneath all carwash conveyer belt trenches/drains and the associated sump may potentially be contaminated.

- 9) Based on field observations and statements by Mr. Parker, the presence of underground fuel tanks associated with a suspect fuel island in the southwest corner of the property is unlikely. The reason that fuel island and storage shed locations were depicted on the 1973 plot plan is unknown.
- 10) The integrity of all facility plumbing and drainage systems at the New Car Prep facility is unknown. However, based on conversations with Mr. Parker and documented agency discharge permit violations, a significant potential exists for impact to underlying soils from these systems.